



*Consulting Engineers  
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September 9, 2009  
(PBW Project No. 1536)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: August 2009 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – A Draft Baseline Human Health Risk Assessment (BHHRA) Report was sent to you on August 31, 2009. In order to expedite completion of the RI/FS through submittal of a single BHHRA deliverable, and as previously discussed with you, the draft BHHRA incorporated the interim human health risk assessment deliverables (Potential Chemicals of Concern (PCOC) Memorandum and Exposure Assessment (EA) Memorandum) required by Paragraph 37a of the SOW.
  - Feasibility Study activities (SOW Paragraphs 43 through 51) detailed under Task 10 of the RI/FS Work Plan, including initial development and screening of alternatives, were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.

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3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through preparation of a Final Updated Screening-Level Ecological Risk Assessment (SLERA) (following receipt of review comments on the Draft Updated SLERA dated May 29, 2009), and preparation of a Final BHHRA (following receipt of review comments on the Draft BHHRA dated August 31, 2009).
  - Feasibility Study activities (SOW Paragraphs 43 through 51) detailed under Task 10 of the RI/FS Work Plan – to be continued through initial development and screening of alternatives.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP